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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA	)	CASE NO. CR 15-00212 JST
	)	
v.	)	STIPULATION AND <del>PROPOSED</del> ORDER
	)	CONTINUING SENTENCING FROM JANUARY
JOSE ORTIZ,	)	8, 2016 TO JANUARY 14, 2016
	)	
a/k/a Jose Vladimir Ortiz,	)	
a/k/a Jose Nevarez,	)	
a/k/a Miguel Perez,	)	
	)	
Defendant.	)	

**STIPULATION**

IT IS HEREBY STIPULATED by the parties, through undersigned counsel, that:

1. The defendant Jose Ortiz (hereafter, the “defendant”) is presently set for sentencing in the above-referenced matter in Oakland on January 8, 2016. The government received the defense sentencing memorandum on Tuesday, January 5, 2016 at 4:59 p.m., and respectfully requests a short continuance in order to draft a reply to issues raised in that pleading. The defense attorney, Joyce Leavitt, who was unaware that the government had not been served with the sentencing memorandum at the time that it was filed, has no objection to this continuance request.

2. After consulting with the Court’s courtroom deputy, the parties now respectfully request

1 a short continuance to Thursday, January 14, 2016, for sentencing, to allow the government to file a  
2 reply to the defense sentencing memorandum.

3 3. The parties now formalize their request for a continuance of this matter to January 14,  
4 2016 at 9:30 a.m. in San Francisco for sentencing. Based on the good cause described above, the parties  
5 make this request to allow for effective preparation of counsel and in the interests of justice.

6 IT IS SO STIPULATED.

7  
8 DATED: January 6, 2016

BRIAN J. STRETCH  
Acting United States Attorney

9  
10 /s/  
11 MICHAEL MAFFEI  
Assistant United States Attorney

12  
13 DATED: January 6, 2016

14  
15 /s/  
16 JOYCE LEAVITT  
Counsel for the Defendant

17  
18  
19 **~~PROPOSED~~ ORDER**

20 For the reasons stated by the parties, the Court finds that the aforementioned request is supported  
21 by good cause and hereby reschedules the sentencing of defendant Jose Ortiz from January 8, 2016 in  
22 Oakland, to Thursday, January 14, 2016, at 9:30 a.m. in San Francisco.

23 IT IS SO ORDERED.

24  
25 DATED: January 6, 2016

  
HONORABLE JON S. TIGAR  
United States District Judge